

UNITED STATES DISTRICT COURT

for the
Northern District of Texas

Carter)
)
v.) Case No.: 3:17-CV-2278-X
)
Transport Workers Union of America, Local 556,)
and Southwest Airlines Co.)

BILL OF COSTS

Judgment having been entered in the above entitled action on 12/19/2022 against TWU 556 and Southwest ,
Date
the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$ 450.00
Fees for service of summons and subpoena	2,103.24
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	13,164.89
Fees and disbursements for printing	
Fees for witnesses (<i>itemize on page two</i>)	3,362.99
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case.	2,480.55
Docket fees under 28 U.S.C. 1923	
Costs as shown on Mandate of Court of Appeals	
Compensation of court-appointed experts	
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	
TOTAL	\$ 21,670.10

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

☒ Electronic service ☐ First class mail, postage prepaid

☐ Other: _____

s/ Attorney: /s/Matthew B. Gilliam

Name of Attorney: Matthew B. Gilliam

For: Charlene Carter Date: 12/19/2022
Name of Claiming Party

Taxation of Costs

Costs are taxed in the amount of _____ and included in the judgment.

By: _____
Clerk of Court Deputy Clerk Date

United States District Court

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)

Name, City, and State of Residence	Attendance	Subsistence	Mileage¹	Total Cost of Each Witness
Audrey Stone, Tampa, FL (11/24/20 Deposition)	1 day, \$40.00	1 day, \$160.00	0	\$200.00
Denise Gutierrez, Dallas, TX (11/6/20 Deposition)	1 day, \$40.00	\$0.00	0	\$40.00
Audrey Stone, Tampa, FL (Trial subpoena served on witness)	1 day, \$40.00	\$0.00	36 miles, \$21.24	\$101.24
Jessica Parker, Loveland, CO (Trial subpoena served on witness)	1 day, \$40.00	\$0.00	1567 miles, \$979.40	\$1,019.40
Brett Nevarez, Las Cruces, NM (Trial subpoena served on witness)	1 day, \$40.00	\$0.00	1280 miles, \$800.04	\$840.04
Edith Barnett, DeSoto, TX (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Nancy Cleburne, Dallas, TX (Address provided by counsel for Southwest) (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Brendon Conlon Dallas, TX (Address provided by counsel for Southwest) (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Maureen Emlett, Dallas, TX (Address provided by counsel for Southwest) (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Denise Gutierrez, Dallas, TX (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Naomi Hudson, Carrollton, TX (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Megan Jones, Dallas, TX (Address provided by counsel for Southwest) (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Sonya Lacore, Dallas, TX (Address provided by counsel for Southwest) (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Brett Nevarez, Las Cruces, NM (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Jessica Parker, Loveland, CO (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83

¹ Witnesses served through Southwest or union counsel were paid for the mileage from counsel's office to the courthouse. Ms. Stone was paid mileage from DFW Airport to the courthouse.

John Parrott, Dallas, TX (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Ed Schneider, Dallas, TX (Address provided by counsel for Southwest) (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Tammy Shaffer, Fort Worth, TX (Trial)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Brian Talburt, Phoenix, AZ (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Mike Sims, Dallas, TX (Address provided by counsel for Southwest) (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$40.83
Denise Gutierrez, Dallas, TX (Trial subpoena served on Southwest counsel)	1 day, \$40.00	\$0.00	1.3 miles, \$0.83	\$61.24
Naomi Hudson, Carrollton, TX (Deposition)	1 day, \$40.00	\$0.00	0	\$40.00
Naomi Hudson, Carrollton, TX (Trial subpoena served on witness)	1 day, \$40.00	\$0.00	39.3 miles, \$24.54	\$64.54
Brett Nevarez, Las Cruces, NM (Trial subpoena served on union counsel)	1 day, \$40.00	\$0.00	4.1 miles, \$2.54	\$42.54
Jessica Parker, Loveland, CO (Trial subpoena served on union counsel)	1 day, \$40.00	\$0.00	4.1 miles, \$2.54	\$42.54
Brett Nevarez, Las Cruces, NM (Deposition subpoena for location in New Mexico)	1 day, \$40.00	\$0.00	1.7 miles, \$1.06	\$41.06
Tammy Shaffer, Fort Worth, TX (Trial subpoena served on witness)	1 day, \$40.00	\$0.00	95.1 miles, \$59.44	\$89.44
Edith Barnett, DeSoto, TX (Trial subpoena served on witness)	1 day, \$40.00	\$0.00	31.9 miles, \$19.94	\$59.94
Sonya Lacore, Irving, TX (Trial subpoena served on witness)	1 day, \$40.00	\$0.00	34.2 miles, \$21.36	\$61.36
John Parrott, Dallas, TX (Trial subpoena served on witness)	1 day, \$40.00	\$0.00	11.5 miles, \$7.20	\$47.20
Total				\$3,362.99

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>V.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p>
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PLAINTIFF CHARLENE CARTER’S ITEMIZED BILL OF COSTS

The Court entered judgment in the above captioned case for Plaintiff Charlene Carter (“Carter”) on December 5, 2022 against Southwest Airlines Co. (“Southwest”) and Transport Workers Union of America, Local 556 (“Local 556”), Carter requests the clerk to tax the following as costs:

Category	Description	Amount
Fees of the Clerk	Complaint Filing Fees	\$400.00
Fees of the Clerk	Pro Hac Vice filing fees for attorneys Matthew B. Gilliam and Jeffrey D. Jennings	\$50.00
Fees for service of summons and subpoena	Service of process	\$270.04
Fees for service of summons and subpoena	Fees to serve subpoena on nonparty witness – former Local 556 President Audrey Stone – attempt service of subpoena	\$66.95
Fees for service of summons and subpoena	Fees to serve subpoena on nonparty witness – former Local 556 President Audrey	\$391.40

	Stone – attempt service of subpoena	
Fees for service of summons and subpoena	Fees to serve subpoena fee on nonparty witness – former Local 556 President Audrey Stone	\$134.85
Fees for service of summons and subpoena	Fees to serve deposition subpoena on witness Brian Talburt	\$1,240.00
Transcripts	Transcript of December 2018 oral arguments on motions to dismiss	\$178.85
Transcripts	Transcript of December 2020 motion to compel proceedings against Southwest	\$18.00
Transcripts	Transcript of Pretrial Conference	\$263.84
Transcripts	Transcript of Trial Week 1	\$2,120.10
Transcripts	Transcript of Trial Week 2	\$1,707.60
Witness Fees	Witness fees for Audrey Stone - subpoena to testify at 11/24/20 third party deposition	\$200.00
Witness Fees	Witness fees for Denise Gutierrez -subpoena to testify at 11/6/20 third party deposition	\$40.00
Witness Fees	Witness fees for Audrey Stone – 7/6/22 trial appearance	\$101.24
Copies	Pryor & Bruce Copies of materials necessarily obtained for use in the case	\$2,480.55
Witness Fees	Witness fees for Jessica Parker	\$1,019.40
Witness Fees	Witness fees for Brett Nevarez	\$840.04
Witness Fees	Witness fees for Edith Barnett	\$40.83
Witness Fees	Witness fees for Nancy Cleburne	\$40.83
Witness Fees	Witness fees for Brendon Conlon	\$40.83
Witness Fees	Witness fees for Maureen Emlett	\$40.83
Witness Fees	Witness fees for Denise Gutierrez	\$40.83
Witness Fees	Witness fees for Naomi Hudson	\$40.83

Witness Fees	Witness fees for Megan Jones	\$40.83
Witness Fees	Witness fees for Sonya Lacore	\$40.83
Witness Fees	Witness fees for Brett Nevarez	\$40.83
Witness Fees	Witness fees for Jessica Parker	\$40.83
Witness Fees	Witness fees for John Parrott	\$40.83
Witness Fees	Witness fees for Ed Schneider	\$40.83
Witness Fees	Witness fees for Tammy Shaffer	\$40.83
Witness Fees	Witness fees for Brian Talburt	\$40.83
Witness Fees	Witness fees for Mike Sims	\$40.83
Witness Fees	Witness fees for Denise Gutierrez	\$61.24
Witness Fees	Witness fees for Naomi Hudson	\$40.00
Witness Fees	Witness fee for Naomi Hudson	\$64.54
Witness Fees	Witness fee for Brett Nevarez	\$42.54
Witness Fees	Witness fee for Jessica Parker	\$42.54
Witness Fees	Witness fee for Brett Nevarez	\$41.06
Witness Fees	Witness fee for Tammy Shaffer	\$89.44
Transcripts	Transcript of Sonya Lacore Deposition taken on June 24, 2022	\$777.25
Transcripts	Transcript of Linda Rutherford Deposition taken on June 23, 2022	\$577.50
Transcripts	Transcript of Melissa Burdine Deposition taken on June 28, 2022	\$1,276.00
Transcripts	Transcript of Nancy Cleburne Deposition taken on June 29, 2022	\$932.00
Transcripts	Transcript of Brendan Conlon Deposition taken on June 28, 2022	\$1,191.00
Transcripts	Transcript of Brett Nevarez Deposition taken on July 4, 2022	\$750.00
Transcripts	Transcript of Brian Talburt Deposition taken on July 3, 2022	\$3,372.75
Exemplification	OnCue Technology Support – Trial Presentation Software Rental	\$86.40

Witness Fees	Witness fee for Edith Barnett	\$59.94
Witness Fees	Witness fees for Sonya Lacore	\$61.36
Witness Fees	Witness fees for John Parrott	\$47.20
Copies	Staples color copies of Exhibit 90-E materials necessarily obtained for use in the case	\$22.03
Total		\$21,670.10

Dated: December 19, 2022

Respectfully submitted,

/s/ Matthew B. Gilliam

Matthew B. Gilliam (*admitted pro hac vice*)

New York Bar No. 5005996

mbg@nrtw.org

c/o National Right to Work Legal Defense
Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Tel: 703-321-8510

Fax: 703-321-9319

Bobby G. Pryor

State Bar No. 16373720

bpryor@pryorandbruce.com

Matthew D. Hill, Of Counsel

State Bar No. 24032296

mhill@pryorandbruce.com

PRYOR & BRUCE

302 N. San Jacinto

Rockwall, TX 75087

Telephone: (972) 771-3933

Facsimile: (972) 771-8343

Certificate of Service

I hereby certify that on December 19, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record

/s/ Matthew B. Gilliam

Matthew B. Gilliam

From: paygovadmin@mail.doc.twai.gov
Sent: Friday, August 25, 2017 11:32 PM
To: Matthew B. Gilliam
Subject: Pay.gov Payment Confirmation: TXND CM ECF

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the U.S. District Court of Northern Texas at (214) 753-2240.

Application Name: TXND CM ECF
Pay.gov Tracking ID: 264FS8NV
Agency Tracking ID: 0539-8629028
Transaction Type: Sale
Transaction Date: Aug 25, 2017 11:31:44 PM

Account Holder Name: Matthew Gilliam
Transaction Amount: \$400.00
Card Type: Visa
Card Number: *****8418

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Matthew B. Gilliam

From: paygovadmin@mail.doc.twai.gov
Sent: Wednesday, September 13, 2017 10:55 AM
To: Jeff D. Jennings; Matthew B. Gilliam
Subject: Pay.gov Payment Confirmation: TXND CM ECF

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the U.S. District Court of Northern Texas at (214) 753-2240.

Application Name: TXND CM ECF
Pay.gov Tracking ID: 264QCDCF
Agency Tracking ID: 0539-8667262
Transaction Type: Sale
Transaction Date: Sep 13, 2017 10:55:10 AM

Account Holder Name: Matthew Gilliam
Transaction Amount: \$25.00
Card Type: Visa
Card Number: *****8418

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Matthew B. Gilliam

From: paygovadmin@mail.doc.twai.gov
Sent: Wednesday, September 13, 2017 10:49 AM
To: Matthew B. Gilliam
Subject: Pay.gov Payment Confirmation: TXND CM ECF

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact the U.S. District Court of Northern Texas at (214) 753-2240.

Application Name: TXND CM ECF
Pay.gov Tracking ID: 264QCBVS
Agency Tracking ID: 0539-8667202
Transaction Type: Sale
Transaction Date: Sep 13, 2017 10:49:03 AM

Account Holder Name: Matthew Gilliam
Transaction Amount: \$25.00
Card Type: Visa
Card Number: *****8418

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

9/19/2017	JW	Review correspondence from Southwest regarding arbitration; follow up on status of service of process on Southwest.	0.20 \$375.00	\$75.00 ✓
9/20/2017	JW	Receive and review clerk notice regarding return of service of process on TWU; review correspondence with arbitrator regarding arbitration date and fee.	0.20 \$375.00	\$75.00 ✓
9/21/2017	JW	Review correspondence from arbitrator.	0.10 \$375.00	\$37.50 ✓
9/22/2017	JW	Review email correspondence from arbitrator and from Lisa White of SWA regarding arbitration dates; review correspondence regarding TWU's withdrawal of current 12(b)(6) motion to dismiss and refiling with respect to amended complaint.	0.10 \$375.00	\$37.50 ✓

For professional services rendered\$2,550.00***Expenses***

Fee for process of service

Amount\$270.04 ✓**Total costs**\$270.04

Total New Charges

\$2,820.04

Previous Balance

\$787.50

Balance Due

\$3,607.54***Payment is due upon receipt***

United States District Court
Northern District of Texas

Date: 03/22/2019
Invoice Number: 20190023

To:

Matthew B. Gilliam
National Right to Work Legal Defense Foundation,
Inc.
8001 Braddock Road
Suite 600
Springfield, VA, 22160

Make Checks Payable To:

Lanie M. Smith
Official US Court Reporter
58 Pine Song Place
The Woodlands, TX, 77381
Phone: (214) 753-2354
Email: laniems@comcast.net

Case Details:

Case Number: 3:17-cv-02278-S
Case Title: Charlene Carter vs. Transport Workers
Union of America Local 556
Case Description: Motion proceedings
Criminal or Civil: Civil

Proceeding Date: Dec 14, 2018
Courthouse: Dallas
Judge Hearing Case: Scholer

Transcripts:

Date Ordered: Mar 08, 2019
Date Delivered: Mar 22, 2019

Charges:

Page Type	Page Count	Rate	Sub-Total
Ordinary Original	49	\$3.65	\$178.85

Total: \$178.85

Amount Due: \$178.85

/s/ Lanie M. Smith



PAYMENT REQUEST

CHECK REQUEST X

WIRE TRANSFER REQUEST _____

AMOUNT \$178.85 DATE 3/22/2019

PAYEE
Lanie M. Smith
Official US Court Reporter
58 Pine Song Place
The Woodlands, TX 77381

PURPOSE Transcript of Motion Proceedings in *Charlene Carter v. Transport Workers* (MBG

INVOICE # 20190023

APPROVAL
SUPERVISOR *R. J. J.*

CODING 70400-02

ACCOUNTING _____

RETURN CHECK TO MMW

DATE REQUIRED 3/29/2019

S & W Process Service

2801 N. FLORIDA AVENUE
Tampa, FL 33602
Phone: 813-251-9197 Fax: 813-251-8976
Federal ID: 27-0641147

Invoice # 296644

Client Info:	Invoice Info:
NATIONAL RIGHT TO WORK FOUNDATION - MATTHEW B. GILLIAM, ESQUIRE 8001 BRADDOCK ROAD, SUITE 600 Springfield, VA 22160	Client Ref # Job # 296644 Invoice Date: 7/1/2020 Client ID: 61089

Case Info:
Court Name: UNITED STATES DISTRICT COURT Court Division: NORTHERN DISTRICT OF TEXAS Case # 3:17-CV-2278-X Plaintiff: CHARLENE CARTER -versus- Defendant: SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556

Service Info:
Serve To: AUDREY LEE STONE Service: NO SERVICE Date: 06/27/2020 Time: 11:00 PM Location: 8300 PENA BLVD Denver, CO 80249

Payment Memo:
Payment - Credit Card # 8418, 605717771 Amount Applied = \$391.40 Date Applied = 6/26/2020 Job # 296644 - Case # 3:17-CV-2278-X
Payment - Credit Card # 8418, 604902937 Amount Applied = \$66.95 Date Applied = 6/15/2020 Job # 296644 - Case # 3:17-CV-2278-X

Qty:	Description	Unit Price:	Line Amount:
1	ROUTINE - LOCAL	\$65.00	\$65.00
1	CREDIT CARD CONVENIENCE FEE	\$1.95	\$1.95
1	RUSH - COLORADO	\$180.00	\$180.00
2	WAIT TIME (HOURLY)	\$100.00	\$200.00
380	CREDIT CARD CONVENIENCE FEE	\$0.03	\$11.40
Sub Total			\$458.35
Amount Paid to Date			\$458.35
TOTAL			\$0.00

Thank you for choosing S & W Process Service!
Your Business is appreciated.



Served 2 Perfection LLC,

320 Gold sw suite 1221
Albuquerque, NM 87102

INVOICE: 4654210

Issued: Jul 1, 2020
Sent to: Matthew Gilliam

Matthew Gilliam

Matthew Gilliam

PAY TO:

Served 2 Perfection LLC,
320 Gold sw suite 1221
Albuquerque, NM 87102

Case: 3:17-cv-2278-X	Plaintiff / Petitioner: Charlene Carter
Job: 4654210	Defendant / Respondent: Southwest Airlines Co., and Transport Workers Union of America, Local 556

Item	Description	Cost	Quantity	Tax	Total
Rush Service of Process	With wait time and after hours	\$125.00	1	\$9.85	\$134.85

Payment	Description	Amount Paid
Jul 1, 2020	Paid by square	(\$134.85)

Thanks for your business. Please pay the "Balance Due" within 15 days.	Subtotal:	\$125.00
	Tax:	\$9.85
	Total:	\$134.85
	Amount Paid:	(\$134.85)
	Balance Due:	\$0.00

Served 2 Perfection LLC, • 320 Gold sw suite 1221, Albuquerque, NM 87102

Call: 505-639-5253 • Fax: 505-717-2167 • Email: kristina@served2perfection.com • Visit: www.served2perfection.com

VALLEYVIEW PROCESS SER
13416 N 12ND ST STE 110
PHOENIX, AZ 850326000
07/05/2022 19:42:22
MID: XXXXXXXXXX418 TID: XXXXX16

CREDIT CARD

W.S. SALE

Card # Token XXXXXXXXXXXXX9999
SEQ #: 6
Batch #: 2:36
INVOICE 6
Approval Code: 06681D
Entry Method: Manual
Mode: Online
Ans Code: NYZ
Card Code: M

SALE AMOUNT \$750.00

I agree to pay above total amount
according to card issuer agreement.
(Merchant agreement if Credit Voucher)

X

MERCHANT COPY

VALLEYVIEW PROCESS SER
13416 N 12ND ST STE 110
PHOENIX, AZ 850326000
07/05/2022 19:12:38
MID: XXXXXXXXXX418 TID: XXXXX16

CREDIT CARD

W.S. SALE

Card # Token XXXXXXXXXXXXX9999
SEQ #: 14
Batch #: 2:33
INVOICE 14
Approval Code: 07160D
Entry Method: Manual
Mode: Online
Ans Code: NYZ
Card Code: M

SALE AMOUNT \$490.00

I agree to pay above total amount
according to card issuer agreement.
(Merchant agreement if Credit Voucher)

X

MERCHANT COPY



Invoice #001087

3:17-cv-2278; CARTER V. TRANSPORT WOKERS UNION OF AMERICA LOCAL 556

Bill ToMatthew Gilliam
mbg@nrtw.org**Invoice Details**PDF created July 28, 2021
\$18.00**Payment**Due July 28, 2021
\$18.00

Item	Quantity	Price	Amount
Motion to Compel - December 12/11/20	20	\$0.90	\$18.00
Subtotal			\$18.00

Total Due **\$18.00****Pay online**To pay your invoice go to <https://gosq.me/u/CUZ2eZ8s>

Or open your camera on your mobile device, and place the code on the left within the camera's view.

From: [Kelli Ann Willis, RPR, CRR, CSR](#)
Sent: Monday, June 20, 2022 6:30 PM
To: [Matthew B. Gilliam](#)
Subject: You paid an invoice! (#000219)



Kelli Ann Willis, RPR, CRR, CSR

Invoice Paid

\$263.84

Paid on June 20, 2022

Invoice #000219

June 20, 2022

Customer

Matthew B Gilliam
National Right to Work Legal Defense Fund
mbg@nrtw.org
703-770-3339
8001 Braddock Road
Suite 600
Springfield, Virginia 22160

Message

Your best record will always come from a certified stenographer!

Invoice summary

Transcript Copy - Expedited	\$256.80
(\$1.20 ea.) x 214	
<i>Carter v Southwest</i>	
<i>Pretrial conference</i>	
	\$7.04
<i>Processing</i>	
Subtotal	\$263.84
Total Paid	\$263.84

Visa 8418

06/20/22,
5:30 PM

ST44 Rev. 04/18
Derived from AO44 Rev. 04/18UNITED STATES DISTRICT COURT
For the Northern District of Texas

INVOICE 278

MAKE CHECKS PAYABLE TO:Matthew Gilliam
National Right to Work Legal Defense
8001 Braddock Road
Suite 600
Springfield, VA 22160
mbg@nrtw.orgKelli Ann Willis, RPR, CRR, CSR
Official Court Stenographer
1100 Commerce Street
Room 1528
Dallas, TX 75242
(214) 753-2654
livenotecrr@gmail.com☐ CRIMINAL ☒ CIVILDATE ORDERED:
07-05-2022

DATE DELIVERED:

In the matter of: 3:17-CV-2278-X, Charlene Carter v Southwest Airlines, et al.

Copy of daily trial transcript with word index/mini - Week 1 - Volumes 1 to 4

CATEGORY	ORIGINAL			1 ST COPY			2 ND COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
Ordinary										
14-Day										
Expedited										
3-Day										
Daily				1424	1.20	1708.80	457	0.90	411.30	2120.10
Hourly										
Realtime										
Misc.	Misc. Charges									
Subtotal										2120.10
Less Discount for Late Delivery										
Tax (If Applicable)										
Less Amount of Deposit										
Total Refund										
Total Due										2120.10

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE:

Kelli Ann Willis

DATE:

DISTRIBUTION:

TO PARTY (2 copies - 1 to be returned with payment)

COURT REPORTER

COURT REPORTER SUPERVISOR

ST44 Rev. 04/18
Derived from AO44 Rev. 04/18UNITED STATES DISTRICT COURT
For the Northern District of Texas

INVOICE 283

MAKE CHECKS PAYABLE TO:Matthew Gilliam
National Right to Work Legal Defense
8001 Braddock Road
Suite 600
Springfield, VA 22160
mbg@nrtw.orgKelli Ann Willis, RPR, CRR, CSR
Official Court Stenographer
1100 Commerce Street
Room 1528
Dallas, TX 75242
(214) 753-2654
livenotecrr@gmail.com☐ CRIMINAL ☒ CIVILDATE ORDERED:
07-19-2022DATE DELIVERED:
07-15-2022

In the matter of: 3:17-CV-2278-X, Charlene Carter v Southwest Airlines

Trial transcript - Week 2

CATEGORY	ORIGINAL			1 ST COPY			2 ND COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
Ordinary										
14-Day										
Expedited										
3-Day										
Daily				1081	1.20	1297.20	456	0.90	410.40	1707.60
Hourly										
Realtime										
Misc.	Misc. Charges									
Subtotal										1707.60
Less Discount for Late Delivery										
Tax (If Applicable)										
Less Amount of Deposit										
Total Refund										
Total Due										1707.60

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE:

Kelli Ann Willis

DATE:

DISTRIBUTION:

TO PARTY (2 copies - 1 to be returned with payment)

COURT REPORTER

COURT REPORTER SUPERVISOR



**NATIONAL RIGHT TO WORK LEGAL DEFENSE
AND EDUCATION FOUNDATION, INC.**

PAYMENT REQUEST

TODAY'S DATE 12/16/2020

CHECK REQUEST x WIRE TRANSFER REQUEST _____

AMOUNT \$200.00

PAYEE Gillespie Sanford LLP
4803 Gaston Ave.
Dallas, TX 75246

PURPOSE Audrey Stone witness expense-Carter (MBG)

INVOICE # 121620

CODING # 66200-02

Return check to LKS no later than 8/7/2020

SUPERVISOR APPROVAL *R.J.L.*

ACCOUNTING _____

12-17-2020 ck no. 33277

33277

68-106/560
17

**NATIONAL RIGHT TO WORK LEGAL DEFENSE
& EDUCATION FOUNDATION, INC.**
OPERATING ACCOUNT
8001 BRADDOCK RD., STE. 600
SPRINGFIELD, VA 22151

BURKE & HERBERT BANK
AT YOUR SERVICE SINCE 1852



*TWO HUNDRED AND XX / 100

DATE
12/17/2020

AMOUNT
*****200.00*

PAY
TO THE
ORDER
OF

GILLESPIE SANFORD LLP
4803 GASTON AVENUE
Dallas, TX 75246

TWO SIGNATURES REQUIRED
VOID 6 MONTHS FROM ISSUED DATE

Agent
Agent
AUTHORIZED SIGNATURE

Agent

Agent

AUTHORIZED SIGNATURE

Photo Safe Deposit®

Details on Back.

NATIONAL RIGHT TO WORK LEGAL DEFENSE

& EDUCATION FOUNDATION, INC.

33277

Date	Invoice Number	Comment	Amount	Discount Amount	Net Amount
12/16/2020	121620	AUDREY STONE WITNESS-CARTER(MBG) deposition witness expenses	200.00	0.00	200.00

Check: 033277

12/17/2020 GILLESPIE SANFORD LLP

Check Total:

200.00



NATIONAL RIGHT TO WORK LEGAL DEFENSE

A EDUCATION FOUNDATION, INC.
OPERATING ACCOUNT

8001 BRADDOCK RD., STE. 600
SPRINGFIELD, VA 22151

34047

55-105/000

11

10/15/2022

AMERICAN BANK
AT YOUR SERVICE SINCE 1852

*ONE HUNDRED ONE AND 24 / 100

DATE

7/14/2022

AMOUNT

*****101.24*

PAY
TO THE
ORDER
OF

AUDREY STONE
GILLESPIE SANFORD LLP
4803 GASTON AVENUE
Dallas, TX 75246

TWO SIGNATURES REQUIRED

VOID 6 MONTHS FROM ISSUED DATE

Clara D. Gray

Agent

Kristen Coffey
AUTHORIZED SIGNATURE

Agent

Photo Safe Deposit®

Details on Back.

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001907
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Edie Barnett

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE



Invoice #PEL-2022002020
 7/5/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/23/2022 Served: 6/30/2022 7:20 pm INDIVIDUAL/PERSONAL
 To be served on: Edith Barnett

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee	1.00	105.00	105.00
Witness Fee - State	1.00	59.94	59.94
TOTAL CHARGED:			\$164.94

BALANCE DUE: **\$164.94**

Comments pertaining to this invoice:
 Subpoena with a \$59.94 Witness Fee
 1132 Southlake Dr., Desoto, TX 75115

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE



Invoice #PEL-2022002021
 7/5/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/23/2022 Non-Served: 7/1/2022 NON-SERVE - INDIVIDUAL
 To be served on: Melissa Burdine

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Surrounding County Service Fee	1.00	105.00	105.00
TOTAL CHARGED:			\$105.00

BALANCE DUE: **\$105.00**

Comments pertaining to this invoice:
 Subpoena with a \$74.93 Witness Fee
 5050 FM, #423, Frisco, TX 75036

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigation.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001913
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Nancy Kleburne

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001908
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Brendon Conlon

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE



Invoice #PEL-2022001901
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Maureen Emlet

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigation.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 Mesquite, TX 75150
 Phone: (214) 744-1981
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INVOICE



Invoice #PEL-2022001903
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Denise Gutierrez

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 38-3772376

INVOICE

Invoice #PEL-2022001997
 6/30/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/22/2022 Served: 6/27/2022 7:53 pm INDIVIDUAL/PERSONAL
 To be served on: Denise Gutierrez

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee	1.00	105.00	105.00
Witness Fee Federal	1.00	61.24	61.24
TOTAL CHARGED:			\$166.24

BALANCE DUE: **\$166.24**

Comments pertaining to this invoice:
 Subpoena with a \$61.24 Witness Fee
 3617 Granbury Dr., Dallas, TX 75287

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001995
 6/23/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/22/2022 Served: 6/22/2022 8:17 pm INDIVIDUAL/PERSONAL
 To be served on: Naomi Hudson

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Surrounding County Service Fee	1.00	105.00	105.00
Witness Fee - State/Documents Only	1.00	40.00	40.00
Rush Fee	1.00	45.00	45.00
TOTAL CHARGED:			\$190.00

BALANCE DUE: **\$190.00**

Comments pertaining to this invoice:

Subpoena with a \$40.00 Witness Fee
 1604 Palisades Dr., Carrollton, TX 75007

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE



Invoice #PEL-2022001911
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Naomi Hudson

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigation.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001996
 6/23/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/22/2022 Served: 6/22/2022 8:17 pm INDIVIDUAL/PERSONAL
 To be served on: Naomi Hudson

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Additional Serve/Same Entity	1.00	50.00	50.00
Witness Fee - State	1.00	64.54	64.54
TOTAL CHARGED:			\$114.54

BALANCE DUE: **\$114.54**

Comments pertaining to this invoice:
 Subpoena with a \$64.54 Witness Fee
 1604 Palisades Dr., Carrollton, TX 75007

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE



Invoice #PEL-2022001902
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Meggan Jones

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigation.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001909
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Sonya Lacore

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
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 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022002022
 7/5/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/24/2022 Served: 7/1/2022 1:20 pm INDIVIDUAL/PERSONAL
 To be served on: Sonya Lacore

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee	1.00	105.00	105.00
Rush Fee	1.00	45.00	45.00
Witness Fee Federal	1.00	61.36	61.36
TOTAL CHARGED:			\$211.36

BALANCE DUE: **\$211.36**

Comments pertaining to this invoice:

Subpoena with a \$61.36 Witness Fee
 9440 Lake Ct., Irving, TX 75063

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 Mesquite, TX 75150
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 38-3772376

INVOICE

Invoice #PEL-2022001918
 6/24/2022

Original Date: 6/20/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/16/2022 8:45 am AUTHORIZED
 To be served on: Brett Nevarez

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	42.54	42.54
Rush Fee (\$45/No Charge)	1.00	0.00	0.00
TOTAL CHARGED:			\$92.54
BALANCE DUE:			\$92.54

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001961
 6/20/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/16/2022 8:45 am AUTHORIZED
 To be served on: Brett Nevarez

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	41.06	41.06
Alternative Address (\$105/No Charge)	1.00	0.00	0.00
Rush Fee (\$45/No Charge)	1.00	0.00	0.00
TOTAL CHARGED:			\$91.06

BALANCE DUE: **\$91.06**

Comments pertaining to this invoice:

Addresses Attempted:

- 1) 3301 Elm Street, Dallas, Texas 75226
- 2) 1100 Commerce Street, Dallas, TX 75242

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com

Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001905
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Brett Nevarez

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE



Invoice #PEL-2022001915
 6/27/2022

Original Date: 6/20/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/15/2022 Served: 6/16/2022 8:45 am AUTHORIZED
 To be served on: Jessica Parker

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	42.54	42.54
Rush Fee/Court Appointment (\$45/No Charge)	1.00	0.00	0.00
TOTAL CHARGED:			\$92.54
BALANCE DUE:			\$92.54

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 Phone: (214) 744-1981
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 38-3772376

INVOICE

Invoice #PEL-2022001960
 6/20/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/16/2022 8:45 am AUTHORIZED
 To be served on: Jessica Parker

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee	1.00	105.00	105.00
Witness Fee Federal	1.00	41.06	41.06
Alternative Address (\$105/No Charge)	1.00	0.00	0.00
Rush Fee (\$45/No Charge)	1.00	0.00	0.00
TOTAL CHARGED:			\$146.06

BALANCE DUE: **\$146.06**

Comments pertaining to this invoice:

Addresses Attempted:

- 1) 3301 Elm Street, Dallas, Texas 75226
- 2) 1100 Commerce Street, Dallas, TX 75242

Payment is due upon receipt.

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Express Litigation Services
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 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001899
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Jessica Parker

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001900
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: John Parrott

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022002012
 7/2/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/23/2022 Served: 7/1/2022 9:20 am INDIVIDUAL/PERSONAL
 To be served on: John Parrott

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee	1.00	105.00	105.00
Witness Fee - State	1.00	47.20	47.20
TOTAL CHARGED:			\$152.20

BALANCE DUE: **\$152.20**

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigation.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001898
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Ed Schneider

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001912
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Tammy Shaffer

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

Express Litigation Services
 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022002019
 6/28/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/23/2022 Served: 6/24/2022 7:20 pm INDIVIDUAL/PERSONAL
 To be served on: Tammy Shaffer

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Surrounding County Service	1.00	105.00	105.00
Witness Fee - State	1.00	89.44	89.44
TOTAL CHARGED:			\$194.44

BALANCE DUE: **\$194.44**

Comments pertaining to this invoice:
 Subpoena with a \$89.44 Witness Fee
 11325 Mesa Crossing Dr., Fort Worth, TX 76052

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigationsservices.com
 Accrual of interest at 1.5% per month will be incurred after 30 days. We appreciate your business!

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 expresslitigation@gmail.com
 18601 LBJ Freeway, Suite 650
 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE

Invoice #PEL-2022001897
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Mike Sims

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee	1.00	105.00	105.00
Witness Fee Federal	1.00	40.83	40.83
Rush Fee	1.00	35.00	35.00
TOTAL CHARGED:			\$180.83

BALANCE DUE: **\$180.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
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 Mesquite, TX 75150
 Phone: (214) 744-1981
 Fax: (214) 853-5141
 38-3772376

INVOICE



Invoice #PEL-2022001906
 6/15/2022

Pryor & Bruce
 302 North San Jacinto
 Rockwall, TX 75087

Your Contact: Cristina Garcia
Case Number: Northern 3:17-CV-02278-X

Plaintiff:
CHARLENE CARTER

Defendants:
SOUTHWEST AIRLINES CO., et al.

Received: 6/14/2022 Served: 6/15/2022 3:00 pm AUTHORIZED
 To be served on: Brian Talburt

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Local Service Fee (\$105/Discounted)	1.00	50.00	50.00
Witness Fee Federal	1.00	40.83	40.83
TOTAL CHARGED:			\$90.83

BALANCE DUE: **\$90.83**

Comments pertaining to this invoice:

Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action and a \$40.83 Witness Fee
 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201

Payment is due upon receipt.
 For Your Convenience You May Pay Online At Our Website:
www.expresslitigation.com
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INVOICE

MELODY MONK REPORTING

Melody Monk Reporting

1999 McKinney Avenue

No. 1404

Dallas, Texas 75201

United States

Phone: 888.988.5317

Mobile: 972.489.8884

BILL TO

Matthew D. Hill

Pryor & Bruce

302 North San Jacinto Street

Rockwall, Texas 75087

United States

972.771.3933

mhill@pryorandbruce.com

Invoice Number: 2376**Invoice Date:** June 30, 2022**Payment Due:** June 30, 2022**Amount Due (USD): \$0.00**

Items	Price	Amount
Deposition (expedited) of Melissa Burdine taken 6.28.2022	\$1,276.00	\$1,276.00
Carter v SWA, et al		

Total: \$1,276.00Payment on July 7, 2022 using  ending in 8418: \$1,276.00**Amount Due (USD): \$0.00**

INVOICE

MELODY MONK REPORTING

Melody Monk Reporting

1999 McKinney Avenue

No. 1404

Dallas, Texas 75201

United States

Phone: 888.988.5317

Mobile: 972.489.8884

BILL TO

Matthew D. Hill

Pryor & Bruce

302 North San Jacinto Street

Rockwall, Texas 75087

United States

972.771.3933

mhill@pryorandbruce.com

Invoice Number: 2370**Invoice Date:** June 30, 2022**Payment Due:** June 30, 2022**Amount Due (USD): \$0.00**

Items	Price	Amount
Deposition (expedited) of Nancy Cleburn taken 6.29.2022	\$932.00	\$932.00
Carter v SWA, et al		

Total: \$932.00Payment on June 30, 2022 using  ending in 8418: \$932.00**Amount Due (USD): \$0.00**

INVOICE

MELODY MONK REPORTING

Melody Monk Reporting

1999 McKinney Avenue

No. 1404

Dallas, Texas 75201

United States

Phone: 888.988.5317

Mobile: 972.489.8884

BILL TO

Matthew D. Hill

Pryor & Bruce

302 North San Jacinto Street

Rockwall, Texas 75087

United States

972.771.3933

mhill@pryorandbruce.com

Invoice Number: 2373**Invoice Date:** June 30, 2022**Payment Due:** June 30, 2022**Amount Due (USD): \$0.00**

Items	Price	Amount
Deposition (expedited) of Brendan Conlon taken 6.28.2022	\$1,191.00	\$1,191.00
Carter v SWA, et al		

Total: \$1,191.00Payment on July 1, 2022 using  ending in 8418: \$1,191.00**Amount Due (USD): \$0.00**

INVOICE

MELODY MONK REPORTING

Melody Monk Reporting

1999 McKinney Avenue

No. 1404

Dallas, Texas 75201

United States

Phone: 888.988.5317

Mobile: 972.489.8884

BILL TO

Pryor & Bruce

Bobby G. Pryor

302 North San Jacinto Street

Rockwall, Texas 75087

United States

9727713933

bpryor@pryorandbruce.com

Invoice Number: 2367**Invoice Date:** June 29, 2022**Payment Due:** June 29, 2022**Amount Due (USD): \$0.00**

Items	Price	Amount
Deposition of Sonya Lacore taken 2.24.2022	\$777.25	\$777.25
Carter v SWA, et al		

Total: \$777.25Payment on June 29, 2022 using  ending in 8418: \$777.25**Amount Due (USD): \$0.00**

INVOICE

MELODY MONK REPORTING

Melody Monk Reporting

1999 McKinney Avenue

No. 1404

Dallas, Texas 75201

United States

Phone: 888.988.5317

Mobile: 972.489.8884

BILL TO

Matthew D. Hill

Pryor & Bruce

302 North San Jacinto Street

Rockwall, Texas 75087

United States

972.771.3933

mhill@pryorandbruce.com

Invoice Number: 2383**Invoice Date:** July 4, 2022**Payment Due:** July 4, 2022**Amount Due (USD): \$0.00**

Items	Price	Amount
Certificate of nonappearance - Brett Nevarez taken 7.4.2022	\$750.00	\$750.00
Carter v SWA		

Total: \$750.00Payment on July 5, 2022 using  ending in 8418: \$750.00**Amount Due (USD): \$0.00****Notes / Terms**

expedited and holiday rates apply

INVOICE

MELODY MONK REPORTING

Melody Monk Reporting

1999 McKinney Avenue

No. 1404

Dallas, Texas 75201

United States

Phone: 888.988.5317

Mobile: 972.489.8884

BILL TO

Matthew D. Hill

Pryor & Bruce

302 North San Jacinto Street

Rockwall, Texas 75087

United States

972.771.3933

mhill@pryorandbruce.com

Invoice Number: 2364**Invoice Date:** June 29, 2022**Payment Due:** June 29, 2022**Amount Due (USD): \$0.00**

Items	Price	Amount
Linda Rutherford taken 6.23.2022 Carter v SWA, et al	\$577.50	\$577.50

Total: \$577.50Payment on June 29, 2022 using  ending in 8418: \$577.50**Amount Due (USD): \$0.00**

INVOICE

MELODY MONK REPORTING

Melody Monk Reporting

1999 McKinney Avenue
No. 1404
Dallas, Texas 75201
United States

Phone: 888.988.5317
Mobile: 972.489.8884

BILL TO
Pryor & Bruce
Bobby G. Pryor
302 North San Jacinto Street
Rockwall, Texas 75087
United States

9727713933
bpryor@pryorandbruce.com

Invoice Number: 2380

Invoice Date: July 4, 2022

Payment Due: July 4, 2022

Amount Due (USD): \$0.00

Items	Price	Amount
Deposition of Brian Talburt taken 7.3.2022 Carter v SWA, et al	\$3,372.75	\$3,372.75

Total: \$3,372.75

Payment on July 5, 2022 using  ending in 8418: \$3,372.75

Amount Due (USD): \$0.00

Notes / Terms

159 pages of expedited testimony
3 pages of exhibits
four hours hourly after 5 p.m.
holiday fees apply



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Subscription Details

Plan

OnCue Monthly

No Additional Payments

Payment Method

Credit Card

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Billing History

Jul 4, 2022

\$86.40

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- Windows 11
- Windows 10 (64 and 32 bit)
- Windows 8 (64 and 32 bit)
- Windows 7
- Windows Vista
- Windows XP



Professional Civil Process



Credit Card Authorization Form

Date: 6/23/22

Company Name: Pryor & Bruce Client #: _____

Contact Name: Cristina Garcia Phone #: 972-771-3933 Email: cgarcia@pryorandbruce.com

Name as it appears on card: Matthew D Hill

Credit Card #: 4147099337489999

Expiration Date: 1/23 Security Code #: 587

Billing Address: 2610 Allen Street, #5207

City: Dallas State: TX Zip Code: 75204

Credit card transactions are subject to a 2.5% Convenience Fee
AMERICAN EXPRESS NOT ACCEPTED

Invoice #:	<u>Rush Service (OOS/\$175)X 3</u>	Amount:	<u>\$525</u>
Invoice #:	<u>Witness fee-Jessica Parker</u>	Amount:	<u>\$1,019.40</u>
Invoice #:	<u>Witness fee-Brett Nevarez</u>	Amount:	<u>\$840.04</u>
Invoice #:	<u>Witness fee-Brian Talburt</u>	Amount:	<u>\$1,284.90</u>
Invoice #:	<u>Check fee (\$3) x3</u>	Amount:	<u>\$9</u>
Invoice #:	_____	Amount:	_____
Invoice #:	_____	Amount:	_____
Invoice #:	<u>Fuel Surcharge 4.00 x address</u>	Amount:	<u>\$12</u>

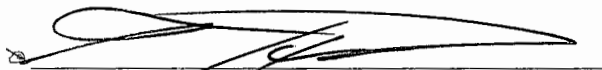
Total Amount of Invoices = \$3,690.34

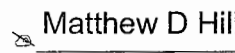
+ \$92.26

2.5% Convenience Fee = \$92.26
 (Total Amount of Invoices x 0.025)

= \$3,782.60

Total Amount Charged = _____


 Signature of Authorized Person

 Matthew D Hill
 Print Name of Authorized Person

INVOICE**Professional Civil Process**

REMIT PAYMENT TO:
103 Vista View Trail
Spicewood TX 78669

QUESTIONS REGARDING CHARGES ON THIS INVOICE ARE TO BE
 DIRECTED TO THE BILLING DEPARTMENT AT: (512) 477-3500

EIN NO.:76-0068034

A CORPORATION - NO 1099 REQUIRED

Bill To:

Hill, Matthew D.
 Pryor & Bruce
 302 N San Jacinto
 Rockwall TX 75087

Customer	Date	Invoice
34461	06/28/22	A22602217

Phone: (972) 771-3933
 400

Case Info: CHARLENE CARTER
 vs. SOUTHWEST AIRLINES CO., ET AL.
Court: Northern District of Texas
Case#: 3:17-CV-02278-X
Your Ref#: 3:17-CV-02278-X Received On: 06/23/22

Regarding: Personally Served NEVAREZ, BRETT at 3012 Sundown Road, Las Cruces, NM 88011 on
 06/24/22 at 09:57:00

Documents: SUBPOENA TO APPEAR AND TESTIFY AT A HEARING OR TRIAL IN A CIVIL ACTION

RUSH SERVICE REQUEST

Comments: WF Ck #VV438 = \$840.04 - JB

WF	WITNESS FEE	840.04
CK	CHECK CHARGE	3.00
G	GAS SURCHARGE	4.00
OT	RUSH O/S SERVED	175.00

INVOICE TOTAL:	\$ 1022.04
PAID TO DATE:	\$ 1022.04
LATE FEE:	\$.00
BALANCE DUE:	\$.00

-----[PLEASE DETACH AND RETURN]-----

Professional Civil Process**Bill To:**

Hill, Matthew D.
 Pryor & Bruce
 302 N San Jacinto
 Rockwall TX 75087

a

Customer	Date	Invoice
34461	06/28/22	A22602217

BALANCE DUE: \$.00

Return to: Professional Civil Process
 103 Vista View Trail
 Spicewood TX 78669

INVOICE DUE AND PAYABLE UPON RECEIPT (IF PAID BY INVOICE),
 ALL CHARGES NOT PAID WITHIN 30 DAYS FROM THE FIRST MONTHLY
 STATEMENT THAT CONTAINS THIS INVOICE ARE SUBJECT TO A SERVICE
 CHARGE AT THE RATE OF .5% PER 30 DAYS, 6% PER ANNUM.

yvonnef

From: [Jami Lair](#)
To: [Cristina Garcia](#)
Subject: FW: Staples Print & Marketing Services: Order 6933023141 is ready to be picked up.
Date: Tuesday, July 5, 2022 8:38:20 AM

Expenses Carter

Jami Lair, Paralegal
Pryor & Bruce
302 N. San Jacinto
Rockwall, Texas 75087
Telephone: (972) 771-3933
Facsimile: (972) 771-8343
www.pryorandbruce.com

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From: Staples Copy & Print <staples-printmarketing@staples.com>
Sent: Monday, July 4, 2022 2:02 PM
To: Jami Lair <jlair@pryorandbruce.com>
Subject: Staples Print & Marketing Services: Order 6933023141 is ready to be picked up.

Dear Dana Bruce,

Great news! Your order is ready to be picked up. Please go to the store and see a Print & Marketing associate for your order.

Thank you for shopping at Staples!

Your Order

#6933023141
Order Date: Jul 03, 2022
Total: \$22.03

Store #1765
1009 E Interstate 30
Rockwall, TX 75087

Phone: (972) 722-2237

Hours

Sun 10am-6pm
Mon 10am-5pm
Tue 9am-8pm
Wed 9am-8pm
Thu 9am-8pm
Fri 9am-8pm
Sat 10am-7pm

Ordered Item

EX 90-E.pdf

Qty

6

Price

\$22.03

Staples



To unsubscribe, click [here](#).

PRYOR & BRUCE

Attorneys at Law

302 N. San Jacinto
Rockwall, Texas 75087

Telephone (972) 771-3933

Fax (972) 771-8343

E-mail dbruce@pryorandbruce.comwww.pryorandbruce.com

July 1, 2022

Invoice: 33-100-06

VIA ELECTRONIC TRANSMISSION

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
5/26	Conf. w/ M. Gilliam re case background, trial strategy, and workload distribution	MDH	1.00
5/27	Conf. w/B. Pryor and M. Hill re case background and strategy	DGB	NC (1.50)
5/27	Email M. Gilliam re confirmation of retention	MDH	.10
5/28	Select key documents for review by B. Pryor	MDH	.30
6/1	Review engagement letter; emails and confs. re the same	BGP	NC (.20)
6/1	Review and approve entry of appearance; emails re the same	BGP	.10
6/1	Email paralegal re drafting appearance of counsel; revise same; email B. Pryor and M. Gilliam re same; analysis of deadlines in scheduling order; conf. w/ M. Gilliam re documents needed and pretrial filings; review case filings in preparation for trial	MDH	4.20
6/1	Prepare notice of appearance; email M. Hill re same; file same	PL2	.20
6/2	Review docket entries and highlight entries needed for trial notebook and review; emails re the same; review scheduling order; emails re jury instructions and voir dire questions; review and outline Fourth Amended Complaint; review case law cited in Fourth Amended Complaint; teleconf w/M. Hill and M. Gilliam re status and strategy; review and outline issues relating to SW Airlines Answer	BGP	6.50

DATE	DESCRIPTION	ATTY	TIME
	to 4th Amended Complaint; emails re the same; review and outline issues re Local 566 Answer to 4th Amended Complaint; emails re the same; review deposition of M. Sims; outline issues re the same; emails re the same; review exhibits re the same; review reported cases involving M. Greenfield to determine whether any involved issues in present action; review reported cases involving P. McKeeby to determine whether any involved issues in present action		
6/2	Conf. w/ M. Gilliam re pretrial filings and strategy; email exchanges w/ B. Pryor re documents to review; identify documents for review in preparation for trial; email exchanges w/ M. Gilliam re same; email exchange w/ B. Pryor re voir dire; email B. Pryor re authorities to review	MDH	3.40
6/2	Assemble documents for B. Pryor trial preparation; research re Greenfield and McKeeby	PL	2.10
6/3	Additional review and outline of deposition of M. Sims; outline voir dire and limine topics; prepare M. Sims deposition resume; create and supplement list of involved persons; review and outline arguments, authorities and evidence re summary judgment motions and responses	BGP	7.00
6/3	Analysis of witnesses who may be designated for deposition; email B. Pryor re use of depositions for witnesses outside subpoena range; confs. w/ B. Pryor re trial and pretrial strategy	MDH	2.60
6/4	Review Amended Scheduling Order re ensuring compliance; additional review and digest of M. Sims deposition; drafting proposed voir dire questions; file review re the same; review SW and Local 556 summary judgment motions and exhibits; review and digest E. Schneider deposition; review exhibits re the same; review pleadings related to the sanction motion; review pleading relating to filing documents under seal	BGP	6.30
6/4	Review and comment on proposed email outlining pretrial tasks; review, comment, and supplement proposed voir dire questions	MDH	.50
6/5	Review written discovery; emails re the same; outline issues re Southwest and Local 556 discovery responses; review witness and exhibit list outline comments to the same; prepare witness list by location and raise Rule 45 issues; emails re the same; review document production; continue deposition review and digest of the same; continue to update voir dire questions and limine issues	BGP	7.70

DATE	DESCRIPTION	ATTY	TIME
6/5	Email B. Pryor re witness issues; email M. Gilliam re issues with motion to withdraw from J. Winford; email M. Gilliam re version of Rule 45 cited in Northern District cases	MDH	.90
6/6	Prepare for teleconf. re status and strategy; teleconf. w/M. Hill and M. Gilliam re voir dire, limine, witnesses, trial exhibit, statements of fact and law, jury instruction; teleconf w/opposing counsel re trial witnesses; review SW documents production re preparing exhibit list	BGP	7.50
6/6	Confs/ w/ M. Gilliam and B. Pryor re strategy and pretrial tasks; additional confs. w/ M. Gilliam re strategy and pretrial tasks; coordinate w/ M. Gilliam on obtaining additional documents; work on proposed jury charges and interrogatories; conf. w/ B. Pryor re settlement strategy; email exchanges w/ B. Pryor re pretrial tasks	MDH	7.80
6/7	Review, revise and finalize voir dire questions; emails re the same; emails and calls re limine issues; review Judge Scholer opinion re the same; review arbitration transcript and exhibits; review SW draft pretrial order; emails and calls re the same; teleconf. w/counsel for Union re witness and exhibit issues; review jury charge and interrogatories; review parties written discovery responses; review all deposition exhibits re preparing exhibit list; review each exhibit listed by SW and supplement exhibit list for document not included by SW; review documents re Carter damages; review exhibit list prepared by M. Gilliam and review documents re the same; supplement exhibit list re the same; review pleading re failure to exhaust administrative remedies; prepare objections to SW exhibit list; email re the same; prepare questions to M. Gilliam re various issues relating to the pretrial order; emails re the same	BGP	13.50
6/7	Continue work on jury instructions and jury interrogatories; comments on additional potential voir dire questions; confs. w/ M. Gilliam re pretrial tasks and strategy; email M. Gilliam re revised draft jury instructions; emails and confs. w/ B. Pryor re pretrial tasks and strategy; work on supplanting exhibit list and analyzing potential exhibits	MDH	11.30
6/8	Analysis and revise draft voir dire questions; review documents re preparing exhibit list; emails re the same; review deposition exhibits and testimony related to the same; emails w/M. Gilliam re status and strategy; review documents added to witness list by defendants; emails re	BGP	6.80

DATE	DESCRIPTION	ATTY	TIME
	witness issues; review M. Emlet deposition and prepare designations re the same; emails re the same		
6/8	Prepare joint and separate jury charges; email B. Pryor and M. Gilliam re same; confs. w/ B. Pryor and M. Gilliam re same; review and comment on proposed objections to disputed jury charges; conf. w/ M. Gilliam re punitive damages issue; review, comment, and supplement issues of law for pretrial filing; confs. w/ M. Gilliam re pretrial filings; review and revise issues of law for pretrial order; work on objections to Southwest's and the union's jury interrogatories; email M. Gilliam re same	MDH	12.40
6/9	Revisions to proposed pretrial order; email exchanges w/ M. Gilliam re same; prepare proposed email to P. McKeeby re pretrial order structure; email M. Gilliam re subpoenas; conference w/ M. Gilliam and opposing counsel re pretrial order; review and comment on Southwest's motion in limine; email opposing counsel re exhibit list; email paralegal re preparing subpoenas; review, comment on, and revise motion in limine; review and comment on deposition designations; additional work on jury interrogatories and instructions; email M. Gilliam re same; confs. w/ M. Gilliam re same and pretrial filings; email B. Morris re proposed exhibit 1 to pretrial order; prepare insert for pretrial filings re punitive damages; confs. w/ opposing counsel re pretrial filings; assist with finalization of pretrial filings	MDH	14.30
6/9	Prepare initial draft of deposition subpoena	PL	.20
6/10	Review and approve subpoenas; review status emails	BGP	.40
6/10	Email M. Gilliam re subpoena form; conf. w/ M. Gilliam re witness issues; conf. call w/ M. Gilliam and opposing counsel re witness issues; prepare email to opposing counsel re subpoenas; review subpoenas	MDH	3.20
6/10	Prepare subpoenas for witnesses; conf. w/ M. Hill re same; email M./ Hill re same	PL2	1.50
6/11	Work on joint status report objections; work on counter-designations and objections re Audrey Stone; review authority re conscience of the community and golden rule limine motions; email M. Gilliam re same; email M. Gilliam re comments, revisions, and additions to joint report on objections	MDH	4.10
6/12	Confs. w/ M. Gilliam re pretrial filings and limine motion; email exchange re objection to initial disclosures as exhibit; review and comment on responses to motion in limine; prepare objections to jury charge and interrogatories; revise	MDH	7.80

DATE	DESCRIPTION	ATTY	TIME
	and supplement objections and responses re Local 556's witnesses and exhibits		
6/13	Revision to objections to jury interrogatories; email exchange w/ M. Gilliam re same; review and comment re charge; email P. McKeeby re additional objection; email P. McKeeby re depositions; work to finalize Joint Status Report	MDH	2.70
6/13	Review joint status report objections; email M. Hill re same	PL2	1.00
6/14	Emails and calls re subpoena issues; review pretrial documents; confs and emails re the same	BGP	4.20
6/14	Conf. w/ B. Pryor and M. Gilliam re pretrial issues and strategy; supervise subpoena issues; email M. Gilliam re same	MDH	.80
6/14	Calculate witness fees for subpoenas; email M. Hill re same; emails re subpoenas; conf. w/ M. Hill re same; email process server subpoenas	PL2	.60
6/15	Review and revise notice re unavailability of witnesses; review rules and Judge's order the same; emails and teleconfs. w/opposing counsel re the same; email to opposing counsel re requesting witness information; review Court's order re limine issues; review pretrial documents; prepare for pretrial conf.; revise draft filing availability of witnesses; strategize re same	BGP	6.30
6/15	Review and comment re Notice of Unavailable Witnesses; additional emails and comments re same; email process server re witnesses to serve; email M. Gilliam re authority on collateral sources	MDH	1.10
6/15	Conf. w/ M. Hill re Union subpoenas; revise same; finalize same; email process server re same; review and revise notice re unavailable witnesses; conf. w/ B. Pryor re same; finalize same; file same	PL2	1.20
6/16	Prepare for pretrial conference; review documents re the same; review C. Carter deposition re preparation for client meeting; attend pretrial conference; conference w/M. Gilliam and C. Carter re status and strategy	BGP	6.40
6/16	Travel to and from courthouse	BGP	NC (1.50)
6/16	Travel to and from pretrial conference	MDH	NC (1.10)
6/16	Attend pretrial conference and viewing of voir dire room; prepare proposed email re dates of testimony	MDH	4.40
6/17	Emails and calls re exhibit issues; emails and calls re witness and deposition issues; emails re status and strategy	BGP	1.30
6/17	Review case recommended by court re business records; email B. Pryor re same; email M. Gilliam and B. Pryor re exhibit issues; call P. McKeeby and A. Greenfield re	MDH	1.70

DATE	DESCRIPTION	ATTY	TIME
	deposition dates; email B. Pryor and M. Gilliam re deposition issues; confs. w/ B. Pryor re pretrial and trial strategy issues		
6/16	Conf. w/B. Pryor re trial exhibits; assemble trial exhibits for trial	PL	2.40
6/17	Conf. w/ B. Pryor re depositions and trial exhibits; email court reporter re same	PL2	.10
6/18	Analysis of witness issues regarding trial witnesses and those to be deposed	MDH	.40
6/20	Emails and confs. re depositions issues; review SW motion for summary judgment motion and exhibits, Carter response to the same and appendix to the same; conf. w/C. Garcia re referencing appendix numbers to trial exhibit list; emails re subpoena issues; review trial exhibits; emails re status and strategy; conf. w/D. Bruce re trial analysis and strategy	BGP	7.30
6/20	Consult w/ B. Pryor re trial strategy	DGB	NC (1.50)
6/20	Conf. w/ B. Pryor re trial logistics and planning; email M. Gilliam re obtaining pretrial conference transcript; email P. McKeeby re depositions; conf. w/ M. Gilliam re witness importance; email M. Gilliam re deposition video logistics; prepare proposed email to opposing counsel re witness issues; email exchange w/ M. Gilliam and B. Pryor re same; email opposing counsel re same; email M. Gilliam re subpoena issues; conf. w/ M. Gilliam re same; email court reporter re videographer needed	MDH	3.20
6/20	Prepare trial and depo subpoena chart; email M. Hill re same	PL2	.30
6/21	Numerous emails and calls re witness issues; review file and emails re the same; review trial exhibits and depositions; general trial and deposition preparation	BGP	5.50
6/21	Email exchange w/ B. Pryor and M. Gilliam re union's extension filing; emails to court reporter re additional deposition scheduled; email B. Pryor and M. Gilliam re deadline to respond to union's motion in limine; review and comment on deposition notices; email M. Gilliam re flight attendant schedule; prepare proposed email to P. McKeeby re deposition issues; conf. w/ M. Gilliam re same; prepare proposed email to P. McKeeby re trial witness scheduling; follow-up email to M. Gilliam re deposition issues; conf. w/ P. McKeeby re deposition issues; email B. Pryor and M. Gilliam re same; email P. McKeeby re same; prepare email to E. Cloutman re witness issues	MDH	6.40

DATE	DESCRIPTION	ATTY	TIME
6/21	Review deposition and trial exhibits and update chart with correlating exhibits	PL	1.10
6/21	Begin Trial and Deposition Exhibit Correlation chart; email M. Hill re same; conf. w/ J. Lair re same; email M. Hill re deposition notices; prepare deposition notices; email M. Hill re same; prepare deposition subpoena; email M. Hill re same	PL2	2.80
6/22	Review documents and depositions in preparation for trial and deposition of Lacore; emails w/M. Gilliam re the same; additional emails and confs. re witness issues; general trial preparation; review limine rulings; review deposition notices; emails re the same; research re evidentiary objections; conf. w/D. Bruce re strategy	BGP	9.70
6/22	Consult w/ B. Pryor re trial strategy	DGB	NC (.30)
6/22	Prepare for deposition of L. Rutherford; review and comment on proposed email to union re witness issues; email paralegal re subpoena form for depositions; revise deposition notices; email opposing counsel re deposition notices; email M. Gilliam re searchable trial exhibits; conf. w/ M. Gilliam re deposition logistics; email P. McKeeby re same; email court reporter re protective order; email M. Gilliam re signed copies of same; review subpoenas and witness fee calculations; email M. Gilliam re subpoena status; review court's amended order re motions in limine; email M. Gilliam re same; email court reporter re serving Talburt	MDH	8.30
6/22	Review deposition and trial exhibits and update chart with correlating exhibits	PL	3.20
6/22	Search deposition word indexes for S. Lacore; prepare deposition notices; email M. Hill re same; finalize same; continue trial and deposition exhibit chart; prepare trial subpoenas; email M. Hill re same; finalize same; email process server re subpoenas	PL2	4.50
6/23	Trial preparation and preparation for Lacore deposition; review documents, emails and confs. re the same	BGP	7.40
6/23	Consult w/ B. Pryor re trial strategy	DGB	NC (.30)
6/23	Email M. Gilliam re Stone subpoena waiver issues; additional preparation for Rutherford deposition; email opposing counsel re exhibits for Rutherford deposition; take deposition of L. Rutherford; confs. w/ M. Gilliam re same; email court reporter re timing of transcript; email M. Gilliam re same; email exchange w/ B. Pryor re Lacore exhibits; conf. w/ B. Pryor re Lacore deposition strategy; research re conferences at deposition breaks; email B.	MDH	7.30

DATE	DESCRIPTION	ATTY	TIME
	Pryor re findings on same; review Southwest's motion to quash subpoenas		
6/23	Prepare trial subpoena for A. Stone; email M. Hill re same; revise Lacore depo prep notes; email B. Pryor re same; continue trial and deposition exhibit chart; review brief re app cites and trial exhibits	PL2	3.70
6/24	Review, organize and outline deposition exhibits re Lacore; teleconf. w/M. Gilliam re the same; Lacore deposition; confs. re trial exhibits and general status and strategy; general trial prep	BGP	6.80
6/24	Email M. Gilliam re Nevarez service status; review and comment on proposed email to P. McKeeby re Lacore availability for trial; email M. Gilliam re Stone subpoena to send for waiver of service; review Lacore trial subpoena; email M. Gilliam re same; research re court-imposed time limits; email B. Pryor and M. Gilliam re same; email B. Pryor re witness list; review depositions in preparation for trial	MDH	6.40
6/24	Draft trial subpoena for S. Lacore; email M. Hill re same; email process server re same; continue working on trial and depo exhibit chart; email B. Pryor and M. Hill re same; email M. Monk deposition exhibits; work on trial exhibit copies	PL2	3.10
6/25	General trial preparation; emails and calls w/M. Hill and M. Gilliam re status and strategy; emails w/opposing counsel re S. Lacore; emails and review of pretrial transcript re representation re S. Lacore; review and revise draft response to Local 556 motion in limine; emails and calls re the same; review response to motion to quash and emails re the same	BGP	4.20
6/25	Email B. Pryor re Southwest's position at pretrial conference on Lacore availability; email B. Pryor re trial witness identities; revise response to Local 556's motion in limine; email M. Gilliam re same; email M. Gilliam re Nevarez affidavit of service; review and comment on response to motion to quash; identify authority re court's inherent power to compel witnesses to trial; email M. Gilliam re same	MDH	3.80
6/26	Review case law re trial time limits; review witness list re the same; review file re the same; draft Objection to Time Limits or, in the Alternative, Motion to Extend Time Limits; review and revise the same; draft affidavit re the same; emails re the same	BGP	3.60

DATE	DESCRIPTION	ATTY	TIME
6/26	Email B. Pryor re witnesses to be deposed; review and revise objection to time limits; email M. Gilliam re witness statuses; review materials in preparation for depositions of Conlon and Burdine	MDH	4.10
6/27	General trial preparation including review limine issues and rulings, outline 4th amended complaint facts, review rial exhibits and prepare notes and witness examination re the same, outline trial objects to limine issues denied, emails re punitive damage issues, outline C. Carter trial preparation issues	BGP	7.70
6/27	Consult w/ B. Pryor re trial strategy	DGB	NC (.20)
6/27	Email court reporter confirming depositions of Conlon and Burdine; download trial software and review operation; email B. Pryor re response to motion in limine; email B. Pryor and M. Gilliam re service status of Hudson; email M. Gilliam re exhibit question; email M. Gilliam re comments on response to motion to quash; confs. w/ M. Gilliam re deposition questions and trial strategy; email paralegal re information for Talburt service; email M. Gilliam re Stone subpoena issues; email process server emphasizing importance of timing in Talburt service; confs. w/ B. Pryor and M. Gilliam re trial strategy and witness assignments; follow-up emails re same; prepare for depositions of Conlon and Burdine	MDH	8.70
6/27	Update subpoena chart re status of service; email M. Hill re same; call process server re same; email process server re same	PL2	.90
6/28	Emails re probable and possible trial witnesses, assigning witnesses; status of subpoenas, Hudson deposition and order of witnesses; teleconf. w/M. Gilliam and M. Hill re the same; review trial exhibits re content and determination of use at trial with witnesses; emails re the same; emails re redacted information in certain exhibits; emails re additional trial exhibits; emails re Stone subpoena and witness fees; teleconf. re motion to enlarge time; conf. w/D. Bruce re trial strategy; emails re C. Carter preparation; review documents re Carter preparation; emails re trial objections to evidence and limine issues	BGP	8.60
6/28	Consult w/ B. Pryor re trial strategy	DGB	NC (.70)
6/28	Finish preparing for Conlon deposition; email exhibits to opposing counsel and court reporter; depose B. Conlon; confs. w/ M. Gilliam re same; email paralegal re Lacore subpoena; conf. w/ M. Gilliam re Cleburn deposition; email court reporter re exhibits and timing; conf. w/ B. Pryor and	MDH	10.40

DATE	DESCRIPTION	ATTY	TIME
	M. Gilliam re witness strategy; email B. Pryor and M. Gilliam re Stone waiver of service requirements; review and comment on proposed email re Hudson deposition cancellation and trial attendance; email M. Gilliam re language for email to opposing counsel re Conlon's deposition testimony being used at trial; update response to motion to quash with service statuses; email M. Gilliam re same; email court reporter re cancellation of Hudson deposition; email M. Gilliam proposed language re confirmation on Stone attendance; prepare for deposition of N. Cleburn; review and comment on proposed email to opposing counsel on witness issues		
6/28	Assemble additional copy of trial exhibits	PL	1.40
6/28	Update subpoena chart re status of service; email M. Hill re same	PL2	.60
6/29	Digest C. Carter deposition; review exhibits re the same; general trial preparation; review supplemental exhibits and emails re the same; emails w/opposing counsel re witness issues; review order from Court re the same; review and revise status report; emails re the same; review and revise motion to enlarge time; emails re the same; review affidavit re the same	BGP	9.30
6/29	Email paralegal re additional exhibits; email M. Gilliam re deposition invoices; final preparation for Cleburn deposition; depose N. Cleburn; email court reporter re exhibits and delivery; conf. w/ M. Gilliam re deposition; conf. w/ B. Pryor re deposition highlights; review and comment on objection to time limits and affidavit re same; prepare chart for joint status report; email M. Gilliam and B. Pryor re same; email P. McKeeby re same; conf. w/ K. Frye re scheduling courtroom technology test; work on joint status report ordered by court on witness issues; email B. Pryor and M. Gilliam re same; email paralegal re same; email P. McKeeby re same; confs. and emails w/ opposing counsel re finalizing joint status report; finalize same for filing; prepare deposition designations for L. Rutherford	MDH	10.60
6/29	Work on additional trial exhibits; update subpoena chart; email M. Hill re same; prepare appendix re joint status report; email M. Hill re same; review and revise joint status report; conf. w/ M. Hill re same; assemble exhibits re appendix; finalize same; file same	PL2	4.20
6/30	Emails re deposition designations; prepare for C. Carter trial preparation; conf. w/C. Carter and M. Gilliam re the same; review and digest A. Stone deposition; review	BGP	9.60

DATE	DESCRIPTION	ATTY	TIME
	exhibits re the same; review and revise motion to enlarge and affidavit re the same; confs. re the same; emails re additional trial exhibits; confs. re the same; review court order re witnesses; confs. and emails re the same; confs. w/M. Hill and M. Gilliam re status and strategy; confs. re determining trial witnesses, order of the same and time allocations		
6/30	Review and comment on deposition designation filings; email paralegal re Rutherford designations; email M. Gilliam re same; email video sync firm re protective order acknowledgement; additional revisions to motion to extend time limits; confs. w/ M. Gilliam and B. Pryor re same; confs. w/ M. Gilliam and B. Pryor re trial strategy and witnesses; conf. w/ C. Carter re trial; prepare designations for Conlon and Cleburn depositions; email M. Gilliam re same; email opposing counsel re motion regarding time limits; email opposing counsel re protective order issues; email opposing counsel re exhibit issue; additional revisions to motion re time limits and affidavit; email opposing counsel in response to order on witnesses; email video sync company re file format for transcripts; additional conf. w/ M. Gilliam and B. Pryor re witness strategy and timing; email videographer re status of deposition videos; review errata sheets from Rutherford and Lacore; email M. Gilliam re same; review and comment on motion for leave to submit exhibits; email exchange w/ M. Gilliam re same; review and comment on deposition designations for Conlon and Cleburn; email M. Gilliam re same	MDH	9.40
6/30	Prepare supplemental deposition designations; review designations for Cleburn and Conlon	PL	.60
6/30	Review designations to add L. Rutherford depo designations; email M. Hill re same; add B. Conlon designations; email J. Lair re same; update subpoena chart; email M. Hill re same	PL2	1.00

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	153.70	\$495.00	\$76,081.50
DGB	4.50 NC	\$495.00	\$0 (\$2,227.50 NC)
MDH	163.60	\$395.00	\$64,622.00
Paralegal	11.00	\$160.00	\$1,760.00
Paralegal 2	25.70	\$110.00	\$2,827.00
<i>Total Attorney/Paralegal Fees:</i>			\$145,290.50

EXPENSES:

Description	Qty.	Amt.	Total
Copies	14,890	.15	\$2,233.50
Pacer			\$19.60
Parking			\$30.00
Professional Civil Process Witness Fees			\$3,782.60
Express Litigation Services (c/o Paulo McKeeby: Barnett, Cleburn, Conlon, Emlet, Gutierrez, Hudson, Jones, Lacore, Nevarez, Parker, Parrott, Schneider, Shaffer, Talburt, Sims)			\$1,452.25
Express Litigation Services (Gutierrez)			\$166.24
Express Litigation Services (Hudson)			\$395.37
Express Litigation Services (c/o Edward Cloutman: Nevarez and Parker)			\$185.08
Express Litigation Services (c/o Adam Greenfield: Nevarez and Parker)			\$237.12
Express Litigation Services (Shaffer)			\$194.44
Professional Civil Process (Parker and Nevarez)			\$364.00
Mileage	60	.29	\$17.40
Total Expenses:			\$9,077.60
Copy Expense Discount:			(\$744.50)
TOTAL EXPENSES DUE:			\$8,333.10

DUE THIS INVOICE: \$153,623.60

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August 2, 2022

Invoice: 002

VIA ELECTRONIC TRANSMISSION

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
7/1	Review pleading re after-acquired evidence defense; emails re the same; prepare for C. Carter trial preparation session; conf. w/M. Gilliam and C. Carter re the same; review Burdine related documents; emails and confs. re press inquiries; review court second amended order on motions in limine; confs. and emails re the same; consider and outline evidence re the same; emails re communication w/Court re efforts to obtain Talburt deposition; review email from opposing counsel re Parker, Nevarez and Talburt subpoena issues; emails re the same; review draft status report re the same; emails w/opposing counsel re depositions; review latest court order re witness subpoenas and depositions; emails and confs. re the same; review Court order re late added exhibits; review deposition designations; review exhibits and prepare for examination of witnesses at trial	BGP	9.00
7/1	Review pleadings re after-acquired evidence; email M. Gilliam and B. Pryor re same; email process server re service of Talburt; meet w/ K. Frye at courthouse to test video setup for trial; email exchange w/ R. Jones re synching deposition videos; review and comment on proposed email to opposing counsel re Parker, Talburt, and Nevarez depositions; review and revise status report on	MDH	8.60

DATE	DESCRIPTION	ATTY	TIME
	witnesses; review and approve deposition subpoenas of Talburt and Nevarez; set up synched transcripts in presentation software; set up exhibits re same; prepare draft email to P. McKeeby re witness status; prepare email to process server re Talburt; revise deposition notices to Talburt and Nevarez; prepare additional draft email to P. McKeeby re deposition issues; email process server re Nevarez; email court reporter/videographer re noticed depositions; conf. w/ process server re Nevarez; prepare draft designations for Burdine		
7/1	Travel to and from courthouse	MDH	NC (1.00)
7/1	Email process server re status; call process server re same; conf. w/ M. Gilliam re same; update subpoena chart; prepare draft deposition subpoenas for Talburt and Nevarez; email M. Hill re same; prepare deposition notices for Talburt and Nevarez; email M. Hill re same; call process servers re pricing and availability; conf. w/ M. Hill re same; email process server re Brian Talburt; email M. Hill re process server for Brett Nevarez; prepare juror chart; email to M. Hill re same; revise deposition notices for Talburt and Nevarez; review pleadings on docket	PL2	2.70
7/2	Prepare witness notebooks for S. Lacore, B. Talburt and N. Hudson; review C. Carter deposition; emails re witness depositions; emails and confs. re B. Talburt deposition; review documents re Talburt deposition; Talburt deposition preparation; review exhibits and prepare for examination of witnesses at trial; emails re time limits on Talburt deposition	BGP	8.40
7/2	Prepare for examination of B. Nevarez; emails to P. McKeeby re depositions of Talburt and Nevarez; prepare presentation software for presentation of exhibits and videos; review and comment on juror diagram; revise juror chart; select portions of Conlon deposition to designate; email Burdine questioning clip to B. Pryor for use with Schneider; review documents sent by C. Carter; conf. w/ P. McKeeby re Talburt deposition; follow-up email re same; conferences w/ M. Gilliam and B. Pryor re trial preparation; email court reporters re deposition scheduling; work on witness order and strategy; prepare new subpoena for B. Talburt; confs. w/ process server re serving Talburt; prepare draft email to E. Cloutman re deposition of Talburt; follow-up email to court reporters with update; email exchange w/ P. McKeeby re deposition scheduling	MDH	9.40

DATE	DESCRIPTION	ATTY	TIME
7/2	Update B. Pryor's exhibit notebooks with added exhibits; update exhibit folders and C. Carter's exhibit binders with added exhibits; trial preparation	PL2	5.10
7/3	Finalize preparation for Talburt deposition; prepare for Stone trial examination; review trial exhibits and highlight questions and related witnesses; review M. Gilliam notes re Talburt deposition; Talburt deposition' trial preparation	BGP	12.20
7/3	Email P. McKeeby re Talburt deposition scheduling; email court reporters updating re same; continue preparing for deposition of B. Nevarez; identify exhibits for same; analysis of potential additional exhibits; email P. McKeeby re deposition; prepare exhibits for trial; confs. w/ B. Pryor and M. Gilliam re trial strategy; email opposing counsel re Talburt exhibits	MDH	9.20
7/3	Trial preparation including updating update trial exhibits; review pretrial transcript and prepare notes re procedures to follow during trial	PL	5.00
7/4	Prepare opening and voir dire; continue review of trial exhibits and highlight questions and related witnesses; conf. w/M. Hill, M. Gilliam, and C. Carter re opening	BGP	11.80
7/4	Additional preparation for Nevarez deposition; finalize jury charts; email M. Gilliam re same; attend non-appearance by B. Nevarez at deposition; comment on proposed opening from B. Pryor; strategy re witness order and trial presentation; prepare for examination of J. Parrott; prepare for examination of M. Sims; email M. Gilliam re potential justifications for sanctions on defendants re depositions; prepare for trial	MDH	10.80
7/4	Trial preparation including updating update trial exhibits; review pretrial transcript and prepare notes re procedures to follow during trial	PL	4.50
7/5	Additional preparation for opening and voir dire; prepare final anticipated witness list, order of witnesses and time allotments; review emails and court rulings re voir dire questions; conf, at trial w/court re voir dire issues and general trial matters; voir dire; hearing before court on strikes for cause; confs. re exercising peremptory challenges; hearing before court on trial matters; conf w/M. Hill and M. Gilliam re status and strategy	BGP	9.30
7/5	Travel to and from Court	BGP	NC (1.00)
7/5	Teleconf. w/B. Pryor re strategy re jury selection and opening	DGB	NC (.60)
7/5	Review and comment re motion for compliance with court order; conf. w/ M. Gilliam re same; email exchange w/ M.	MDH	10.60

DATE	DESCRIPTION	ATTY	TIME
	Gilliam re daily transcripts; review and comment on proposed order on failure to appear; email OnCue re issues displaying exhibits; email B. Pryor re objections to make at trial; notes re preparation for voir dire; attend voir dire; prepare proposed exhibit email for court; prepare unredacted exhibits; prepare designations for J. Parker; preparations for potential witness examinations		
7/5	Travel to and from Court	MDH	NC (.80)
7/5	Email M. Hill indexes of trial boxes	PL2	.10
7/6	Prepare for opening and Stone examination; conf. w/court re trial matters; trial including opening and Stone examination; post trial confs w/court; conf w/M. Hill and M. Gilliam re status and strategy	BGP	10.60
7/6	Travel to and from Court	BGP	NC (1.00)
7/6	Teleconf. w/OPC's paralegal re exhibit list; email w/M. Hill re same; conf. w/C. Garcia re same; teleconf. w/B. Pryor re strategy re witness examination	DGB	NC (.50)
7/6	Attend trial; email S. Rhea re exhibit list; email OnCue re support for presentation software; email M. Gilliam re designation objections; prepare responses to objections re Parrott and Rutherford designations	MDH	11.40
7/6	Travel to and from Court	MDH	NC (.80)
7/6	Call w/ S. Rhea re exhibit list; revise joint exhibit list; email M. Hill re same; file amended exhibit list; email M. Hill re same; review video duration times; email M. Hill re same; update subpoena chart	PL2	.60
7/7	Prepare for additional Stone examination and prepare for Schneider examination; prepare argument for additional jury time; conf w/court re trial matters including request for additional jury time; trial including examination of Stone and Schneider; post trial confs. w/court; conf w/M. Hill and M. Gilliam re status and strategy; preparation for additional Schneider examination and Carter examination	BGP	13.40
7/7	Travel to and from Court	BGP	NC (1.00)
7/7	Teleconf. w/B. Pryor re upcoming Carter examination	DGB	NC (.60)
7/7	Revisions to responses to objections to Parrott and Rutherford designations; email S. Silver re Exhibit 21; attend trial; email paralegals re redactions; revise Talburt designations to cut time; edit video re same; email paralegals re serving Nevarez; email opposing counsel re service of Nevarez; conf. w/ process server re same; email process server re revisions to declaration; prepare proposed declaration re same; email K. Willis re Talburt designations; email M. Gilliam re status of same	MDH	11.30

DATE	DESCRIPTION	ATTY	TIME
7/7	Travel to and from Court	MDH	NC (.80)
7/7	Redactions to trial exhibits and marking as trial exhibits	PL	.80
7/7	Prepare revised draft deposition subpoena for Brett Nevarez; call New Mexico process server; email M. Hill re same; call Dona Ana Process Servers re service on Brett Nevarez; email M. Hill re same; email Dona Ana process server and M. Hill re Brett Nevarez service; review exhibit list to check if Exhibit 21-a was added twice; email M. Hill re same	PL2	1.50
7/8	Trial preparation; conf. w/court re trial matters; trial including examination of Schneider and Carter; conf. w/court re post trial matters; conf w/M. Hill and M. Gilliam re status and strategy	BGP	9.80
7/8	Travel to and from Court	BGP	NC (1.00)
7/8	Email exchange w/ M. Gilliam re process server declaration; prepare Zoom link for Nevarez deposition; email court reporters and opposing counsel re same; attend trial; prepare for Nevarez deposition; take Nevarez deposition; confs. w/ B. Pryor and M. Gilliam re same; email videographer re same; email B. Pryor and M. Gilliam re excusing Parrott and Shaffer; email M. Gilliam re notifying court on Nevarez deposition; email court re same	MDH	11.60
7/8	Travel to and from Court	MDH	NC (.80)
7/9	Status email re invoking the rule issues, objecting to cyber bullying exhibit, future use of time, February 2017 RFB exhibit, Nevarez deposition, C. Carter testimony, potential Sim testimony, and directed verdict issues; emails re the same; review documents and emails re designation of workplace bullying policy; review court draft jury questions; review Local 556 brief re directed verdict issues; review SW brief re directed verdict issues; review C. Carter brief re directed verdict; review Nevarez designations	BGP	4.50
7/9	Email answers to trial strategy questions from B. Pryor; review and comment on draft trial brief; conf. w/ M. Gilliam re same; email potential authority for use in same to M. Gilliam; email R. Jones re synching Nevarez transcript; review and revise trial brief; email M. Gilliam re same; prepare designations for B. Nevarez; prepare video re same	MDH	5.60
7/10	Review notes re C. Carter direct examination and prepare for conclusion of the same; review documents re C. Carter damages; prepare examination re the same; prepare for opposition to late added exhibit re cyber bullying; review documents re the same; emails re damage issues; review	BGP	5.60

DATE	DESCRIPTION	ATTY	TIME
	directed verdict notes; organize Carter deposition re doctrine of optional completion on anticipated cross examination topics		
7/10	Teleconf. w/B. Pryor re trial strategy and case theories	DGB	NC (.30)
7/10	Email M. Gilliam re Nevarez designations; email B. Pryor re C. Carter direct strategy; review and comment on jury charge trial brief; identify exhibits to object to; review and comment on draft objections; email S. Silver re Exhibit 147	MDH	4.20
7/11	Additional preparation for C. Carter cross examination; prepare for informal charge conference; review draft instructions and questions re the same; informal charge conference; pretrial matters; trial including conclusion of C. Carter examination, resting C. Carter case, SW witnesses and post-trial issues; prepare for cross examination of Schneider and initial preparation for closing	BGP	12.60
7/11	Travel to and from Court	BGP	NC (1.00)
7/11	Identify objections to deposition counter-designations by Southwest; prepare draft objections; email M. Gilliam re same; attend trial; email opposing counsel re redacted exhibits; email B. Pryor re Schneider transcripts; review and comment on potential objections; email K. Frye re redacted exhibits; email B. Pryor and M. Gilliam re accommodation language; prepare exhibit re net worth; email B. Pryor re strategy re same	MDH	11.20
7/11	Travel to and from Court	MDH	NC (.80)
7/11	Additional redactions for Court; email exchange w/ M. Hill; determine exhibit correlation; revise exhibits; email M. Hill re same	PL2	1.60
7/12	Emails and confs re damage issues; review daily trial transcripts re witness examination and closing preparation; review court draft jury charge; trial including cross examination of SW witnesses and C. Carter; review trial exhibits re preparation for demonstrative evidence during closing; conf w/M. Gilliam and M. Hill; charge conference; prepare for closing argument; teleconfs re the same	BGP	14.60
7/12	Travel to and from Court	BGP	NC (1.00)
7/12	Attend trial; analysis of court's jury charge; conf. w/ B. Pryor re closing; prepare materials re same; email B. Pryor re strategy for union punitive damage argument; work on preparing exhibits and testimony for closing; email B. Pryor re outline re same	MDH	16.80
7/12	Travel to and from Court	MDH	NC (.80)
7/12	Assemble admitted trial exhibits for jury; update index re same	PL	2.10

DATE	DESCRIPTION	ATTY	TIME
7/12	Assemble admitted exhibits notebooks	PL2	1.20
7/13	Prepare for closing; emails and confs. re the same; pretrial conf. issues; trial including closing	BGP	10.30
7/13	Travel to and from Court	BGP	NC (1.00)
7/13	Work on identifying additional testimony for closing; prepare highlights re same; prepare exhibits re same; attend trial; strategy re jury question	MDH	6.10
7/13	Travel to and from court; wait for jury verdict	MDH	NC (3.80)
7/13	Update admitted trial exhibits index with additional admitted exhibits; email re same	PL	.30
7/13	Revise admitted trial exhibits index; email M. Hill re same; conf. w/ M. Hill re admitted trial exhibits index; revise same; email M. Hill re same; call w/ courier re box of admitted trial exhibits to court	PL2	.80
7/14	Travel to courthouse; await jury verdict; hearing re jury verdict; conf. w/client	BGP	NC (4.80)
7/14	Strategy re jury questions; analysis of verdict; wrap up trial and remove documents from courtroom	MDH	1.60
7/14	Wait for jury verdict; travel to and from Court	MDH	NC (7.30)
7/15	Emails re press inquiries; emails re status and strategy; review press reporting re Southwest and Union statements; emails and teleconf w/M. Gilliam re contact w/jurors	BGP	.40
7/15	Email M. Gilliam and B. Pryor re media strategy; email M. Gilliam re Rule 50 timing	MDH	.20
7/16	Analysis re post-verdict motions; email findings to M. Gilliam	MDH	1.70
7/18	Review press reports; calls and confs re the same; interview juror; confs w/M. Gilliam re status and strategy	BGP	NC (3.30)
7/18	Search and email M. Hill re sample of motion for fees	PL2	.60
7/19	Prepare prejudgment interest calculation; locate cases re calculation of same; email M. Gilliam re same	MDH	.60
7/20	Email M. Gilliam re confidentiality of trial transcripts	MDH	.10
7/24	Begin review of motion for judgment; email M. Gilliam re same	MDH	1.10
7/25	Review cases re damage caps on union; email exchange w/ M. Gilliam re same; review and comment on motion for judgment; review and comment on affidavit in support of same; revise prejudgment interest calculation spreadsheet; emails to B. Pryor and M. Gilliam re same	MDH	2.30
7/26	Review revised motion for judgment; confs. w/ M. Gilliam re same; emails w/ M. Gilliam re same;	MDH	1.30
7/27	Review court's order to determine deadline for potential reply re sanctions; email M. Gilliam re same	MDH	.10

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	132.50 (15.10 NC)	\$495.00	\$65,587.50 (\$7,474.50 NC)
DGB	2.00 NC	\$495.00	\$0 (\$990.00 NC)
MDH	135.80 (16.90 NC)	\$395.00	\$53,641.00 (\$6,675.50 NC)
Paralegal	12.70	\$160.00	\$2,032.00
Paralegal 2	14.20	\$110.00	\$1,562.00
Total Attorney/Paralegal Fees:			\$122,822.50

EXPENSES:

Description	Qty.	Amt.	Total
Copies	1,647	.15	\$247.05
Pacer			\$1.70
Parking			\$312.70
OnCue Technology Support			\$86.40
Express Litigation Services (Burdine)			\$105.00
Express Litigation Services (Barnett)			\$164.94
Express Litigation Services (Lacore)			\$211.36
Express Litigation Services (Parrott)			\$152.20
Dona Ana Servers (Nevarez)			\$146.22
North Texas Legal Video (Lacore, Conlon, Cleburn, Nevarez 07/08/22)			\$1,609.00
Valleywide Process Service (Talbert)			\$1,240.00
MetroOne Courier			\$104.83
Staples			\$22.03
Mileage	317	.29	\$91.93
Total Expenses:			\$4,495.36
Express Litigation Services Credit:			(\$90.83)
Professional Civil Process Credit:			(\$1,741.16)
TOTAL EXPENSES DUE:			\$2,663.37

PAST DUE (JULY 1, 2022):	\$153,623.60
DUE THIS INVOICE:	\$125,485.87
TOTAL DUE:	\$279,109.47

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September 3, 2022

Invoice: 003

VIA ELECTRONIC TRANSMISSION

Charlene Carter
 c/o National Right to Work Legal Defense Foundation, Inc.
 8001 Braddock Road, Suite 600
 Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
8/2	Conf. w/ M. Gilliam re judgment issues; email M. Gilliam re article and case re same; locate and email M. Gilliam unredacted documents	MDH	.60
8/3	Conf. w/ M. Gilliam re invoices; email M. Gilliam re same	MDH	NC (.30)
8/3	Conf. w/ M. Gilliam re RLA punitive damages issue	MDH	.60
8/5	Review Local 556 correspondence to SWA re Lacore; emails and calls re the same	BGP	NC (.40)
8/8	Review and comment on reply in support of motion for sanctions; email M. Gilliam re same	MDH	.80
8/9	Review Hill declaration re sanction; review reply re non-compliance; emails re the same	BGP	NC (.40)
8/9	Conf. w/ M. Gilliam re reply in support of motion for sanctions; additional comments on same; review and comment on Hill Declaration re same; review Southwest's response to motion for entry of judgment; review union's response re same	MDH	.80
8/10	Review SW response to Motion for Entry of Judgment; review B. Morris affidavit; emails re the same; emails re press inquiries	BGP	NC (.40)
8/11	Conf. w/ M. Gilliam re issues in reply in support of motion for judgment	MDH	.30
8/12	Email re comments to SW motion re entry of judgment	BGP	NC (.20)

DATE	DESCRIPTION	ATTY	TIME
8/15	Review reply to SW response to motion for entry of judgment; email comments to M. Hill re the same	BGP	NC (.40)
8/15	Review draft reply in support of motion for judgment re Southwest; email M. Gilliam re same	MDH	.30
8/16	Review and comment on Local 556 response to motion for judgment; emails re the same	BGP	NC (.50)
8/16	Comment on draft reply in support of motion for judgment re Southwest; comment on same re union; additions to draft reply in support of judgment to address Scudero case; conferences w/ M. Gilliam re briefs	MDH	4.80
8/31	Email M. Gilliam re attorney fee affidavit sample	MDH	.20

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	(2.30 NC)	\$495.00	(\$1,138.50 NC)
DGB	NA	\$495.00	\$0
MDH	8.40 (.30 NC)	\$395.00	\$3,318.00 (\$118.50 NC)
Paralegal	NA	\$160.00	\$0
Paralegal 2	NA	\$110.00	\$0
Total Attorney/Paralegal Fees:			\$3,318.00

EXPENSES:

NA

TOTAL DUE:**\$3,318.00**

PRYOR & BRUCE

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December 3, 2022

Invoice: 004

VIA ELECTRONIC TRANSMISSION

Charlene Carter

c/o National Right to Work Legal Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, Virginia 22160

Re: *Charlene Carter v. Southwest Airlines Co., and Transport Workers Union of America, Local 556*

DATE	DESCRIPTION	ATTY	TIME
11/11	Review court order re calculation of prejudgment interests; emails re the same	BGP	.20
11/11	Review order re prejudgment interest; email M. Gilliam re interest calculation logistics; conf. w/ M. Gilliam re same; prepare spreadsheet re same	MDH	.90
11/13	Initial review of brief and chart re prejudgment interest	MDH	.20
11/14	Review supplemental brief re calculation of prejudgment interest; emails re the same	BGP	.20
11/14	Review and comment on prejudgment interest brief and calculation; email M. Gilliam re same; conf. w/ M. Gilliam re same; final review and comments on brief	MDH	2.30
11/16	Review Union brief re pre-judgment interest; emails re the same; review Court's order re award of sanctions; prepare emails to M. Hill re matters for inclusion	BGP	.70
11/16	Email M. Gilliam re advisability of motion to strike late-filed brief; review Court's order re award of sanctions	MDH	.30
11/17	Review and comment on draft submission on Nevarez; emails to M. Hill re same	BGP	.30
11/17	Review and revise draft submission on Nevarez fees from M. Gilliam; review invoices to identify time to include; research to locate additional cases for inclusion in submission; review and comment on proposed addition from B. Pryor; confs. w/ M. Gilliam re submission	MDH	5.10

DATE	DESCRIPTION	ATTY	TIME
11/18	Email M. Hill re additional thoughts on Nevarez fee submission; review and approve declaration of B. Pryor re fees and expenses; additional review and comment re fee submission; confs. w/ M. Hill re same	BGP	.60
11/18	Further revisions to submission re Nevarez; confs. w/ M. Gilliam re same	MDH	4.60
11/18	Review August invoice for expenses related to Nevarez; email M. Hill re same; conf. w/ M. Hill re same; review expense chart re additional Nevarez charges; email M. Hill re same	PL2	.30
11/21	Email B. Pryor re bill of costs filing correction by court	MDH	.10
11/22	Review Southwest and Union objections to bill of costs; emails re the same	BGP	.30
11/22	Review Southwest's objection re sanctions; email M. Gilliam key argument points re same	MDH	.30
11/25	Review reply brief re bill of costs	BGP	.10
11/25	Review, revise, and comment on reply brief re sanctions; email M. Gilliam re same; confs. w/ M. Gilliam re same; email M. Gilliam re local rule issue; final review and comments on reply brief	MDH	2.70

ATTORNEY/PARALEGAL HOURS/FEEES

ATTY	Hours	Rate	Total
BGP	2.40	\$495.00	\$1,188.00
DGB	NA	\$495.00	\$0
MDH	16.50	\$395.00	\$6,517.50
Paralegal	NA	\$160.00	\$0
Paralegal 2	.30	\$110.00	\$33.00
Total Attorney/Paralegal Fees:			\$7,738.50

EXPENSES:

NA

TOTAL DUE:**\$7,738.50**